



1300 I Street, NW
Suite 500 East
Washington, DC 20005

William H. Johnson
Senior Vice President
Federal Regulatory & Legal Affairs

December 31, 2021

VIA ELECTRONIC MAIL

Joel D. Taubenblatt
Acting Chief
Wireless Telecommunications Bureau

Ronald T. Repasi
Acting Chief
Office of Engineering and Technology

Federal Communications Commission
45 L Street, NE
Washington, DC 20554

Re: Co-existence Between Phase I C-band Deployments and Radio Altimeters

Dear Messrs. Taubenblatt and Repasi:

I am writing in response to your December 30 letter asking Verizon to confirm compliance with precautionary measures regarding its 5G deployments in the 3.7-3.8 GHz portion of the C-band spectrum (i.e., 3.7-4.2 GHz).¹ As reflected in the attached Declaration of Kyle Malady, Executive Vice President and Chief Technology Officer of Verizon, we confirm that:

1. In each PEA in which Verizon holds C-band licenses, we will implement the Mitigation Commitments prior to initiating service, and those commitments will remain in place until at least July 6, 2022, absent further action by the Commission.
2. The C-band base stations that Verizon deploys will comply with 3GPP standards for out-of-band emissions during this six-month period.

Verizon continues to believe that the Commission's current rules are sufficient to ensure both the rapid deployment of 5G and the safety of aviation. Nonetheless, we remain committed to these precautionary measures to allow additional time for continued analysis, without waiver of our legal rights associated with our C-band licenses.

¹ See Letter from Joan Marsh, Executive Vice President of Federal Regulatory Affairs, AT&T, and Kathleen M. Grillo, Senior Vice President – Public Policy & Governmental Affairs, Verizon, to the Honorable Jessica Rosenworcel, Chairwoman, FCC, GN Docket No. 18-122 (Nov. 24, 2021), at 6-7. Your December 30 letter refers to these measures as "Mitigation Commitments."

Joel D. Taubenblatt
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Please contact the undersigned with any questions.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "William H. Johnson", with a long, sweeping horizontal line extending to the right.

William H. Johnson
Senior Vice President, Verizon

Attachment

cc: (via email)

Matthew Pearl
Ira Keltz

DECLARATION OF KYLE MALADY

1. My name is Kyle Malady and I am Executive Vice President of Global Networks and Technology and Chief Technology Officer of Verizon. In that capacity, I have responsibility for and knowledge of Verizon's deployment of 5G wireless technology in the 3.7-4.2 GHz band (the "C-band").
2. The purpose of my declaration is to certify that Verizon will comply with precautionary measures with respect to its C-band deployment reflected in the joint Verizon/AT&T November 24, 2021 letter to FCC Chairwoman Rosenworcel (the "Mitigation Commitments"). In particular:

In each PEA in which Verizon holds C-band licenses, we will implement the Mitigation Commitments prior to initiating service, and those commitments will remain in place until at least July 6, 2022, absent further action by the Commission.

The C-band base stations that Verizon deploys will comply with 3GPP standards for out-of-band emissions during this six-month period.

3. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief, based on the information available to me.

December 31, 2021



Kyle Malady